

FILED

## UNITED STATES DISTRICT COURT

APR 01 2021

Western District Of Texas Del Rio Division

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY *[Signature]*  
DEPUTY CLERK

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

Dakota LEON  
Veronica PECHCase Number: *DR: 21-562M-01, 02*

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about February 18 to March 30 <sup>2021</sup> in Val Verde County, in the Western District Of Texas defendant(s), conspire with other unnamed co-conspirators, to transport, or move or attempt to transport or move, certain persons, knowing or in reckless disregard of the fact that that such persons were aliens illegally present in the United States, a felony,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(v)(I)

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

On February 18 to March 30, 2021 Border Patrol Agents, along with the assistance of Custom and Border Protection Officers, and Department of Public Safety Officers, arrested Veronica Araujo Pech and Dakota Destiny Leon in Val Verde County, which is in the Western District of Texas. On the Morning of March 30, 2021, a Border Patrol Agent-Intelligence arrived near a location that had already been identified as a potential alien stash house at 102 Harris St, Del Rio, Texas. There he observed a full-size white van arrive at the suspected stash house, and what appeared to be a suspected female driver and three female subjects exit the van and enter the house. A short time later, the female driver and a male subject came out with several large water bottles and put them into the van. The male ran back into house and the female driver entered the van and left the residence.

Continued on the attached sheet and made a part of this complaint:

Yes  No

*[Signature]*  
Signature of ComplainantHernandez, John

Printed Name of Complainant

Sworn to before me and signed in my presence,

April 01, 2021

Date

Victor Roberto Garcia  
U. S. Magistrate Judge

Name of Judge

Title of Judge

Del Rio, Texas

City/State

Signature of Judge

**AFFIDAVIT**

In support of Criminal Complaint

**UNITED STATES OF AMERICA****CRIMINAL COMPLAINT**

V.

Dakota LEON  
Veronica PECH

Case Number:

As the female driver drove past the Agent, he saw the driver at a closer distance and suspected that Dakota Leon was driving the white van. Some of the Agents and Officers stayed to continue to watch Pech and Leon and others followed the van to a nearby O'Riely's Auto Locksmith. While that was taking place, Pech and Leon were observed eating at IHOP then sitting outside of restaurant. As time passed Agents could see the two individuals leave the restaurant and get into a white minivan.

*SEE ATTACHES)*SUBSCRIBED and SWORN to before me this 1st day of April, 2021.

Signature of Judicial Officer

Signature of Complainant

Victor Roberto Garcia  
U. S. Magistrate Judge

On March 30, 2021 Border Patrol Agents, along with the assistance of Custom and Border Protection Officers, and Department of Public Safety Officers, arrested Veronica Araujo Pech and Dakota Destiny Leon in Val Verde County, which is in the Western District of Texas. On the Morning of March 30, 2021, a Border Patrol Agent-Intelligence arrived near a location that had already been identified as a potential alien stash house at 102 Harris St, Del Rio, Texas. There he observed a full-size white van arrive at the suspected stash house, and what appeared to be a suspected female driver and three female subjects exit the van and enter the house. A short time later, the female driver and a male subject came out with several large water bottles and put them into the van. The male ran back into house and the female driver entered the van and left the residence.

As the female driver drove past the Agent, he saw the driver at a closer distance and suspected that Dakota Leon was driving the white van. Leon had already been identified as a suspected alien smuggler/scout operating in the local area. The agent then contacted other agents to assist and followed the van at a distance for short time until she parked at the automotive area of Walmart near Veterans Blvd. While at Walmart, multiple agents observed Dakota Leon enter the store and return to van several times. On one occasion a second female escorted Leon to the van. The second female was identified as Veronica Pech. Pech had also already been identified previously as a suspected alien smuggler operating in the local area. Both females repeatedly entered store and then returned to the van. Prior to the van leaving Walmart, a male subject was observed entering the van with Leon and Pech. As Agents followed, the van drove to IHOP restaurant on Veterans Blvd. There, Agents and Officers observed Pech, Leon, and the male subject enter IHOP. After a short period, the male subject entered the van and left the restaurant.

Some of the Agents and Officers stayed to continue to watch Pech and Leon and others followed the van to a nearby O'Riley's Auto Parts. There, the male driver got off van and was approached by agents who identified themselves and suspecting he was undocumented, began to inquire about his identity. The male subject first claimed he was born in the United States. Assisting DPS Officer's attempted to confirm by photo the name and date of birth he had given. After presenting him a photo of a different person for the name he provided, he admitted he was not legally in the United States and was taken into custody. The male later identified as Romualdo Castro-Soto a citizen of Mexico stated he was being driven by Leon in Pech's van prior to driving to the parts store. Castro-Soto also stated Pech, which he referred to as "Vero", had previously offered him \$1,000 USD per occasion to act as a guide and transport aliens to a designated location so them may circumvent the immigration checkpoint, in which he refused. After confirming the male in the van with Pech and Leon was undocumented, agents and officers returned to the suspected stash house and now strongly suspecting the subjects the agent had observed earlier that day were also undocumented citizens and possibly more in the house.

While that was taking place, Pech and Leon were observed eating at IHOP then sitting outside of restaurant. As time passed Agents observed both Pech and Leon begin to seem impatient and appear to be waiting for their ride to return. After some time passed, both females walked across parking lot of the Mall near IHOP and into ROSS department store. Pech and Leon exited store after a short time with bags of merchandise they had purchased and walk back to sit on the IHOP bench where they continued to wait. After both being continuously observed by Agents and Officers on their phones sitting on the bench. Leon then got up and began to walk across Veterans Blvd to Auto Zone auto parts.

At that point, a “knock and talk” on the suspected stash house was conducted while agents were watching Pech and Leon separately. Based on observations of Agents outside the home, Val Verde County Sheriff Deputies were called to perform a welfare check on the house. After Deputies and Agents entered an open but barricaded door, they discovered 34 undocumented citizens, including two 14-year-old children. It was determined that Pech and Leon were communicating via group chat with one of the 14-year-old females present at the stash house. Agents then observed Pech leave abruptly, abandoning all of her belongings and merchandise and started walking towards the Walmart. At that point, both Pech and Leon were taken into custody.

Prior to this arrest, Veronica Pech had prior encounters by law enforcement concerning her involvement with illegal alien smuggling. The first encounter was with CBP at the Del Rio Port of Entry on February 8, 2021 involving one undocumented citizen attempting to drive one of Pech’s vehicles into Mexico. The second encounter was with the Department of Public Safety on Hwy 277 on February 21, 2021 involving six undocumented citizens (failed smuggling attempt). Lastly on March 5, 2021, Del Rio Police Department encountered Pech with six undocumented citizens (failed smuggling attempt) including one female child. This same child was one of the thirty-four illegal aliens found at the stash house. The white van Leon was driving during this event has Pech’s PO Box listed on the registration.